

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER, JOHN
DOES 1 THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON
CORPORATION'S MOTION TO IMPOUND THEIR OPPOSITION
TO PLAINTIFF SHAREHOLDER.COM'S MOTION FOR LEAVE TO
DISCLOSE INFORMATION DESIGNATED BY DEFENDANTS AS "CONFIDENTIAL"**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") (collectively, "Defendants") submit this Motion to Impound their Opposition to Plaintiff Shareholder.com's Motion For Leave to Disclose Information Designated By Defendants As "Confidential" (the "Opposition"). Impoundment is necessary because the Opposition contains references to, and attaches copies of, documents produced by defendants that have been designated as "Confidential" and "Highly Confidential" under the terms of the Stipulated Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By its attorneys,

/s/ Jennifer L. Chunias
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DATED: July 22, 2005

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for Defendants conferred with counsel for Plaintiff and Defendant Robert Adler in a good faith effort. Counsel for Defendant Robert Adler assents to the motion. Plaintiff does not assent to the motion.

/s/ Jennifer L. Chunias

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